

Robert S. Brown, State Bar No. 187845  
**ROBERT S. BROWN, APC**  
714 West Olympic Boulevard, Suite 450  
Los Angeles, California 90015  
Telephone: (213) 745-6300  
Facsimile (213) 261-3906

JONATHAN CORBETT,  
**THE LAW OFFICE OF JONATHAN CORBETT**  
958 N. Western Avenue, Suite 765  
Hollywood, CA 90029  
Telephone: (310) 684-3870  
[jon@corbetttrights.com](mailto:jon@corbetttrights.com)

Attorneys for Plaintiff DANIEL COHEN

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

DANIEL COHEN,

Plaintiff,

vs.

LOS ANGELES COUNTY, et al.,

Defendants.

Case No. 2:15-cv-3576-JAK (AGR)  
*Judge Hon. John A. Kronstadt*  
*Magistrate Hon. Alicia G. Rosenberg*

**PLAINTIFF DANIEL COHEN'S  
RULE 30(b)(6) DEPOSITION  
NOTICE TO DEFENDANT  
COUNTY OF LOS ANGELES**

**Date: October 14, 2021**  
**Time: 10:00 a.m.**  
**Location: ZOOM**

**TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that pursuant to Rule 30 of the Federal Rules of Civil Procedure, on **October 14, 2021 at 10:00 a.m.**, Plaintiffs will take the ZOOM deposition of the following Rule 30(b)(6) designee(s) upon oral examination, before any Notary Public, duly commissioned by the State of California, who may be present on the said date, time, and place. These depositions will continue from day to day, excluding Sundays and legal holidays, until completed.

1 PLEASE TAKE FURTHER NOTICE that Plaintiffs intend to record the  
2 deponent's testimony at the deposition by videotape and audiotape, in addition to  
3 recording the testimony stenographically.

4 PLEASE TAKE FURTHER NOTICE that pursuant to Fed. Civ. P. Rule 30(b)(6),  
5 Defendant COUNTY OF LOS ANGELES is required to designate and fully prepare one  
6 or more of its officers, directors, agents, employees and/or other qualified persons to  
7 testify on its behalf with respect to the following subject matters:

8 **Rule 30(b)(6) Topics**

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10 1. Any and all facts regarding the medical treatment that Daniel Cohen received  
11 from the County of Los Angeles between December 31, 2013 and May 8, 2014.

12 2. Any and all facts regarding any medical treatment, aid or attention received  
13 by Daniel Cohen from Teresa Malone January 1, 2014 and May 8, 2014.

14 3. Any and all facts regarding any report(s) of any incident(s) made by Daniel  
15 Cohen in which he alleged that he was the victim of violence by any other inmate or  
16 pretrial detainee while in custody of the County of Los Angeles between January 28,  
17 2013 and May 8, 2014.

18 4. Any and all investigations of the County of Los Angeles regarding any  
19 allegation of Daniel Cohen that he was a victim of violence while he was in the custody  
20 of the County of Los Angeles.

21 5. Any and all investigations of the County of Los Angeles regarding any  
22 allegation of Daniel Cohen that he received inadequate medical treatment, aid or attention  
23 while he was in the custody of the County of Los Angeles.

24 6. Any and all facts regarding any denial by the County of Los Angeles of any  
25 request of Daniel Cohen for eyeglasses between January 28, 2013 and May 8, 2014.

26 7. The identity of any County of Los Angeles employee who denied Daniel  
27 Cohen's request for eyeglasses for the time period between January 28, 2013 and May 8,  
28 2014.

1           8. Any and all operative policies of the County of Los Angeles regarding the  
2 housing, care and monitoring of vision-impaired inmates or pretrial detainees for the time  
3 period between January 28, 2013 and May 8, 2014.

4           9. Any and all operative policies of the County of Los Angeles regarding the  
5 protection of the inmates or pretrial detainees against violence by other inmates or  
6 pretrial detainees for the time period between January 28, 2013 and May 8, 2014.

7           10. Daniel Cohen's housing assignments while in the custody of the County of  
8 Los Angeles between January 28, 2013 and May 8, 2014.

9           11. The identity of all doctors and nurses who provided medical care to Daniel  
10 Cohen, on behalf of the County of Los Angeles, for the time period between January 28,  
11 2013 and May 8, 2014.

12           12. Any and all facts regarding Deputy Shah's decision to cancel Daniel Cohen's  
13 medical appointment in April of 2014.

14           13. Any and all operative policies of the County of Los Angeles regarding the  
15 transport of inmates or pretrial detainees from the County of Los Angeles jail facility to  
16 any outside medical facility for medical treatment purposes, for the time period between  
17 January 28, 2013 and May 8, 2014.

18           14. Any and all information that the County of Los Angeles had in its possession  
19 regarding any eye surgery that Daniel Cohen had for the time period between January 28,  
20 2013 and May 8, 2014.

21           15. The identity of the Los Angeles County Deputies who were on duty in the  
22 dormitory where Daniel Cohen was housed during the time period between February 12,  
23 2013 and February 15, 2013.

24           16. Any and all information regarding Daniel Cohen being selected for work  
25 release in March 2013.

26           17. Any and all facts regarding Daniel Cohen's medical screening at the time that  
27 he began his incarceration with the County of Los Angeles in January 2013.  
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**Monell Information**

18. The identity of all current or former County of Los Angeles Sheriff's Deputies who have been investigated by the County of Los Angeles for denying an inmate or pretrial detainee the opportunity to receive medical care or treatment for the time period from January 1, 2013 to the present.

19. All of the County of Los Angeles' sustained findings that a current or former County of Los Angeles Sheriff's Deputy denied an inmate or pretrial detainee the opportunity to receive medical care or treatment for the time period from January 1, 2013 to the present.

20. The identity and contact information of all individuals who initiated a complaint of denial of the opportunity to receive medical care or treatment against a current or former County of Los Angeles Sheriff's Deputy during the time period from January 1, 2013 to the present.

21. The identity of all current or former County of Los Angeles medical staff employees who have been investigated by the County of Los Angeles for deliberate indifference to the medical needs of an inmate or pretrial detainee for the time period from January 1, 2013 to the present.

22. All of the County of Los Angeles' sustained findings that a current or former County of Los Angeles medical staff employee was deliberately indifferent to the medical needs of an inmate or pretrial detainee for the time period from January 1, 2013 to the present.

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2 23. The identity and contact information of all individuals who initiated a  
3 complaint of deliberate indifference to the medical needs of an inmate or pretrial detainee  
4 against a County of Los Angeles medical staff employees during the time period from  
5 January 1, 2013 to the present.  
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8 Dated: October 1, 2021

9 ROBERT STANFORD BROWN, APC  
10 TAYLOR & RING

11 /s/ Robert S. Brown

12 By: \_\_\_\_\_  
13 Robert S. Brown, Esq.  
14 Jonathan Corbett, Esq.  
15 Attorneys for Plaintiff DANIEL COHEN  
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**PROOF OF SERVICE**

*Cohen v. Los Angeles County, et. al.*  
Case No.: 2:15-cv-3576-JAK (AGR)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 714 West Olympic Blvd., Ste 450, Los Angeles, CA 90015.

On October 1, 2021, I served the foregoing document(s) described as **PLAINTIFF DANIEL COHEN'S RULE 30(b)(6) DEPOSITION NOTICE TO DEFENDANT COUNTY OF LOS ANGELES** on all interested parties in this action, as follows: on the interested party in this action at the address listed below, as follows:

Ade Jackson, Esq.  
Ivie McNeil Wyatt Purcell & Diggs  
444 S. Flower Street, Suite 1800  
Los Angeles, CA 90071  
Attorney for Defendants  
Wkwyatt@imwlaw.com

(X) FOR COLLECTION. By placing a true copy (copies) thereof enclosed in a sealed envelope(s), addressed as above, and by placing said sealed envelope(s) for collection and mailing on that date following ordinary business practices. I am "readily familiar" with the business' practice for collection and processing of correspondence for mailing the U.S. Postal Service. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business.

(X) VIA E-MAIL. By transmitting a true copy the designated counsel on the service list to the email addresses as listed above.

( ) PERSONAL DELIVERY. I will hand-deliver the foregoing documents.

I declare under penalty under the laws of the State of California that the above is true and correct. Executed on October 1, 2021 in Los Angeles County, California.

/s/ Robert S. Brown

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Robert S. Brown

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